



**Todd A. Spodek, Esq.**  
Direct Dial: (347) 292-8633  
ts@spodeklawgroup.com

July 23, 2025

**BY ECF:**

The Honorable Margaret M. Garnett  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Request GRANTED. Pretrial Services may temporarily return Mr. Aburto's passport to facilitate his travel to Miami, Florida from August 8 - 11, 2025. The Clerk of Court is respectfully directed to terminate Dkt. No. 52. SO ORDERED.

Dated: July 23, 2025

RE: United States v. Jose Aburto  
Case No.: 25-cr-00093-2 (MMG)  
Southern District of New York  
Unopposed Letter Motion Seeking Temporary Return of Passport

Dear Judge Garnett:

Please be advised that I represent **Jose Aburto** in the above-captioned action.

Mr. Aburto is currently subject to release conditions as per the March 14, 2024, Appearance Bond (See ECF No. 3). Pursuant to these conditions, Mr. Aburto surrendered his travel documents to Pretrial Services after his arrest.

We respectfully submit this letter to request that Mr. Aburto's passport be temporarily returned to him so he can travel to Miami, Florida, with his significant other from August 8 to August 11, 2025. This is our fifth request for a modification of any kind.

PTSO Taelor Nisbeth was made aware of this request. Pretrial Services does not object. AUSA Adam S. Sowlati and the Government defer to the position of Pretrial Services.

Thank you in advance for your time and consideration in this matter.

Sincerely,  
**Spodek Law Group P.C.**  
/s/ Todd A. Spodek  
Todd A. Spodek

cc: All Counsel of Record (By ECF).  
PTSO Taelor Nisbeth (By Email).